

REMARKS

This is a Reply to the Office Action dated May 2, 2005. Claims 1-6, 8-15, 17-25, 27 and 28 are pending in the above-referenced patent application. All of the claims were rejected. Claims 1-6, 8-15, 17-25, 27 and 28 were rejected under 35 USC 112, second paragraph, as being indefinite. Claims 1-3, 6, 8-12, 15, 17-22, 25, 27 and 28 were rejected under 35 USC 102(e) as being anticipated by USPN 6,133,847 to Yang (hereinafter “Yang”). Claims 4, 5, 13, 14, 23 and 24 were rejected under 35 USC 103(a) as being unpatentable over USPN 6,466,233 in view of Official Notice by the Examiner.

Claim Rejections under 35 USC 112

Claims 1-6, 8-15, 17-25, 27 and 28 were rejected under 35 USC 112, second paragraph, as being indefinite. Specifically, the Examiner states that Claim 1 provides insufficient antecedent basis for “the user interface description” in line 8 and “said information” in line 13. The same rejection was applied to Claims 10 and 20. Claims 1, 10 and 20 have been amended to overcome these rejections. Applicant notes that it appears that only Claim 1 required amendment to provide antecedent basis for “the user interface description” referenced by the Examiner, while Claims 1, 10 and 20 have been amended to provide antecedent basis for “said information”.

Claim Rejections under 35 USC 102(e)

Claims 1-3, 6, 8-12, 15, 17-22, 25, 27 and 28 were rejected under 35 USC 102(e) as being

anticipated by Yang. Rejection of the claims is respectfully traversed because Yang does not disclose all of the claimed limitations.

Yang is directed to a remote control device that is able to be programmed after initial manufacture to accommodate the control of additional apparatuses. The remote control device includes a multi-functional, interchangeable user interface where the interface is modified such that it is able to control the functions of a variety of different types of apparatuses. (Abstract)

As per **Claim 1**, there is no disclosure in Yang of a case in which initially information is obtained from the appliances to generate a top page that includes links for direct access to user interface information in the appliances, such that when a link in the top page is user selected, the appliance user interface information in the corresponding appliance is accessed to generate a user interface for user interaction with the selected appliance, as claimed herein.

By contrast, in Yang, the control programs for appliances are: (1) either pre-loaded into the remote control memory before the user utilizes the remote control to select an appliance for interaction (col. 8, lines 19-24), or if the control program of a particular appliance is not preloaded into the remote control memory, then (2) the remote control automatically downloads the appliance control program before the user utilizes the remote control to select the appliance for interaction (col. 8, lines 59-66).

In other words, there is no disclosure in Yang of a case where the remote control 100 presents to the user a top page with links for direct access to control programs contained in the appliances 150 themselves, wherein when the user selects an appliance link in the top page, the remote control 100 downloads the corresponding control program from the appliance itself, as claimed herein.

As such, Yang (col. 8, lines 10-24, relied on by the Examiner) does not disclose: “obtaining information from one or more of the devices currently connected to the network ... **generating a top page user interface description including a reference** associated with the device information in each of said devices currently connected to the network, such that each reference ... includes at least one electronic **link providing direct access** from the top page user interface description **to said device information contained in said devices** currently connected to the network,” as required by Claim 1 (emphasis added).

Not only does Yang not disclose generating a top page user interface description, in Yang there is no step of *presenting to* a user a top page with a list of links that provide direct access to control programs contained in the appliances themselves (and there is no need for such a feature in Yang). By contrast, in Yang, without user intervention the control programs for appliances are either pre-loaded into the remote control memory, or the remote control automatically downloads an appliance control program before the user utilizes the remote control to select the appliance for interaction.

Even if based on the Examiner's interpretation Yang's remote control provides a user with icons representing appliances (col. 8, lines 14-19, relied on by the Examiner), such icons do not form a top page including electronic links that provide direct access to information contained in the appliances, as claimed herein, wherein each link itself is used to access device information contained in the corresponding appliance.

There is no case in Yang wherein: "**w**hen a **l**ink in the top page user interface description **i**s user activated, the control interface description **i**n the corresponding device is accessed **u**sing the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device," as required by Claim 1 (emphasis added). If the Examiner believes otherwise, Applicant respectfully requests that the Examiner cite specific language in Yang which discloses such limitations. For at least these reasons, it is respectfully requested that rejection of Claim 1, and all claims dependent therefrom, be withdrawn.

Claims 10 and 20 were rejected for the same reasons as rejection of Claim 1, and as such rejection of Claims 10, 20, and all claims dependent therefrom should be withdrawn for at least the reasons provided in relation to Claim 1.

As per **Claim 2**, Yang (col. 8, lines 17-24, relied on by the Examiner) does not disclose that: "the link comprises a pointer from the top page user interface description to at least the

information in a corresponding device,” as required by Claim 2. In col. 8, lines 17-24, Yang states:

“In order to control a particular appliance with the remote control device, the user would select the icon that represents the particular appliance. The selection of the icon would provide a control signal to the functions interface and the functions interface would then access the control software for that appliance from **memory** and configure the user interface function control panel so that it would be configured to control the appliance selected.” (emphasis added).

In the above passage (or elsewhere in Yang) there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in the above passage or elsewhere in Yang of a link for direct access for control program in an appliance. Indeed, in the above passage Yang states that the functions interface accesses the control software for that appliance from the remote control memory, not from the appliance. As such, Yang does not disclose a link that comprises a pointer from the top page user interface description to at least the information in a corresponding device, as claimed herein. For at least these reasons, it is respectfully requested that rejection of Claim 2 be withdrawn.

Claims 11 and 21 were rejected for the same reasons as rejection of Claim 2, and as such rejection of Claims 11 and 21 should be withdrawn for at least the reasons provided in relation to Claim 2.

As per **Claim 3**, Yang (col. 8, lines 10-14, relied on by the Examiner) does not disclose the steps of: “generating the top page user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each device,” as required by Claim 3. As discussed in relation to Claim 1, Yang does not disclose a top page user interface description as claimed. In col. 8, lines 10-14, Yang states:

“In the network application described above, and for any application where multiple appliances to be controlled are located in the same room, the remote control device could receive an interface control signal for each of the appliances on the network or in the room.”

There is no mention in the above passage of generating a top page user interface description that includes device data corresponding to each device based on the information obtained from each device. The interface control signal in Yang is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory (Yang, col. 2, lines 27-30). This has nothing to do with generating the top page user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each device, as claimed. For at least these reasons, it is respectfully requested that rejection of Claim 3 be withdrawn.

Claims 12 and 22 were rejected for the same reasons as rejection of Claim 3, and as such rejection of Claims 12 and 22 should be withdrawn for at least the reasons provided in relation to Claim 3.

As per **Claim 8**, Yang (col. 2, lines 27-33 and col. 8, lines 17-24, relied on by the Examiner) does not disclose: “generating the top page user interface description such that each link in the top page user interface description provides direct access to at least the user control interface description in each corresponding device,” as required by Claim 8. As discussed above, in col. 8, lines 17-24 (or elsewhere in Yang) there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an appliance. Indeed, Yang states that the functions interface accesses the control software for that appliance from the remote control memory, not from the appliance. As such, Yang does not disclose a link that provides direct access to at least the user control interface description in each corresponding device, as claimed herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control *memory*. The control signal is not a link that provides direct access to the control program in appliance, as claimed herein. For at least these reasons, rejection of Claim 8 should be withdrawn.

Claims 17 and 27 were rejected for the same reasons as rejection of Claim 8, and as such rejection of Claims 17 and 27 should be withdrawn for at least the reasons provided in relation to Claim 8.

As per **Claim 9**, Yang (col. 2, lines 27-33 and col. 8, lines 17-24, relied on by the Examiner) does not disclose: “generating the top page user interface description such that the top page user interface description further includes device data corresponding to each device based on the information obtained from each device, the device data providing an electronic link to the user control interface description in each device, such that when the link in the top page is user activated it provides access to control interface description in the corresponding device,” as required by Claim 9.

As discussed above, in col. 8, lines 17-24 (or elsewhere in Yang) there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an appliance. Indeed, Yang states that the functions interface accesses the control software for that appliance from the remote control memory, not from the appliance. As such, Yang does not disclose a link that provides direct access to at least the user control interface description in each corresponding device, as claimed herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control *memory*. The control signal is not a

link that provides direct access to the control program in appliance, as claimed herein.

Not only does Yang not disclose generating a top page user interface description, in Yang there is no step of presenting to a user a top page with a set of links that provide direct access to control programs contained in the appliances themselves (and there is no need for such a feature in Yang). By contrast, in Yang, without user intervention the control programs for appliances are either pre-loaded into the remote control memory, or the remote control automatically downloads an appliance control program before the user utilizes the remote control to select the appliance for interaction.

There is no case in Yang wherein when a link in the top page user interface description is user activated, the control interface description in the corresponding device is accessed using the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device, as claimed herein. For at least these reasons, rejection of Claim 9 should be withdrawn.

Claims 18 and 28 were rejected for the same reasons as rejection of Claim 9, and as such rejection of Claims 18 and 28 should be withdrawn for at least the reasons provided in relation to Claim 9.

As per **Claim 19**, Yang (col. 2, lines 27-33; col. 8, lines 10-14 and 17-24) does not

disclose: “generating at least one top page user interface by: using each link in the top page user interface description to access the device information in each corresponding device, and generating the top page user interface including device data corresponding to each device using the accessed information in each device,” as required by Claim 19.

In Yang, col. 2, lines 10-14, there is no mention in the above passage of generating a top page user interface description that includes device data corresponding to each device based on the information obtained from each device. The interface control signal in Yang is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control memory (Yang, col. 2, lines 27-30). This has nothing to do with generating at least one top page user interface by: using each link in the top page user interface description to access the device information in each corresponding device, and generating the top page user interface including device data corresponding to each device using the accessed information in each device, as claimed.

Further, in col. 8, lines 10-14 and 17-24, there is no disclosure of electronic links as disclosed. Further, Yang’s icons are not links as claimed herein. Further, there is no mention in Yang of a link for direct access for control program in an appliance. Indeed, Yang states that the functions interface accesses the control software for that appliance from the remote control memory, not from the appliance. As such, Yang does not disclose a link that provides direct access to at least the user control interface description in each corresponding device, as claimed

herein. Further, the interface control signal in Yang, col. 2, lines 27-30, is simply an appliance signal sent to the remote control which the remote control uses to retrieve the program code for that appliance from the remote control *memory*. The control signal is not a link that provides direct access to the control program in appliance, as claimed herein.

Not only does Yang not disclose generating a top page user interface description, in Yang there is no step of presenting to a user a top page with a set of links that provide direct access to control programs contained in the appliances themselves (and there is no need for such a feature in Yang). By contrast, in Yang, without user intervention the control programs for appliances are either pre-loaded into the remote control memory, or the remote control automatically downloads an appliance control program before the user utilizes the remote control to select the appliance for interaction.

There is no case in Yang wherein when a link in the top page user interface description is user activated, the control interface description in the corresponding device is accessed using the activated link to obtain device information and generate a device user interface for user interaction with that corresponding device, as claimed herein.

Further, Yang makes no mention of a top page user interface description from which a top page user interface can be generated using links in the top page user interface description to obtain device information, because Yang simply shows device icons based on pre-loaded

appliance control programs in the remote control memory. For at least these reasons, rejection of Claim 19 should be withdrawn.

Claim Rejections under 35 USC 103(a)

Claims 4, 5, 13, 14, 23 and 24 were rejected under 35 USC 103(a) as being unpatentable over USPN 6,466,233 to Yang in view of Official Notice by the Examiner.

At the outset, Applicant points out that USPN 6,466,233 is to Mitani not to Yang. Applicant assumes that the Examiner intended to refer to USPN 6,133,847 to Yang as in the rejections under 35 USC 102(e), and as such Applicant responds accordingly. If that is not the intention of the Examiner, Applicant respectfully requests that the Examiner clarify the matter such that Applicant can respond accordingly.

The rejections are respectfully traversed. Applicant respectfully notes that the Examiner has improperly used an omnibus rejection to reject Claims 4, 5, 13, 14, 23 and 24.

As per Claims 4, 5, 13, 14, 23 and 24, as the Examiner also states, Yang does not disclose the steps of associating a hyper-text link with the device information in each of said devices currently connected to the network, such that each hyper-text link provides access from the top page user interface description to the device information in a corresponding device, as claimed herein. Further, as the Examiner also states, Yang does not disclose that device information in

each device comprises an HTML page for user interaction with and/or control of that device, as claimed herein.

The Examiner relies on Official Notice for the proposition that using hyper-text links and HTML pages as claimed would have been obvious to one of ordinary skill in the art. The Examiner further contends that it would have been obvious to one of ordinary skill in the art to include hyper-text links and HTML pages in Yang to control the appliances remotely from the Internet via HTTP protocol.

However, there is motivation or suggestion in Yang to modify it as the Examiner suggests. Further, as discussed above, Yang does not disclose links for direct access to control programs in appliances. As such, there is no reason or motivation to include hyper-text links in Yang. Further, in Yang, there is no mention, motivation or suggestion about Internet or HTTP protocol or suggestion to utilize such protocols in the remote control.

Yang does not disclose a user interface description that includes links to appliances, wherein when the link for a device is selected by the user, the selected link is used to access control program information stored in the device to obtain the user interface for the selected device for the user to control the device. There is no top page user interface description in Yang with links for access to appliances, wherein when the link is selected by the user, the link is used to access the appliance and access the user interface (i.e., control program) for the appliance.

Rather, in Yang, an “interface control signal” is used to access control program of the appliance that is already stored in the remote control memory.

For at least these reasons, rejection of Claims 4, 5, 13, 14, 23 and 24 should be withdrawn.

CONCLUSION

Please charge any deficit or credit any surplus to our Deposit Account No. 01-1960. A duplicate copy of this page is enclosed for this purpose.

Accordingly, Applicants respectfully request that the rejections of the claims be withdrawn, and the claims, be allowed for at least the aforementioned reasons. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Certificate of Mailing

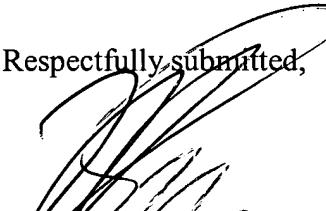
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July 28, 2005.

By: Sarah A. Nielsen

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Respectfully submitted,


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